

1 MASE MEBANE & BRIGGS, P.A.  
2 Christopher G. Lyons  
3 Florida Bar No.: 985457  
4 2601 South Bayshore Drive, Suite 800  
5 Miami, Florida 33133  
6 Telephone: (305) 377-3770  
7 Facsimile: (305) 377-0080  
8 *Pro Hac Vice*

9 Ronald Gainor, Esq.  
10 Florida Bar No. 0606960  
11 Amber Donner, Attorney at Law  
12 Florida Bar No. 600032  
13 6414 Fairways Drive  
14 Longmont, CO 80503  
15 Phone: (720) 201-3036  
16 Fax: (303) 447-0930  
17 gainorlaw@gmail.com  
18 *Pro Hac Vice*

19 Adam Pennella  
20 California Bar No. 246260  
21 717 Washington Street  
22 Oakland, CA 94607  
23 Phone: (510) 451-4600  
24 Fax: (510) 451-3002  
25 adam@wps-law.com

26 Attorneys for Defendant  
27 VASILE MEREACRE

28 UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN JOSE DIVISION

UNITED STATES OF AMERICA,

*Plaintiff,*

v.

VASILE MEREACRE,

*Defendant.*

Case No. CR 18-348 LHK (NC)

**STIPULATION AND [~~PROPOSED~~]  
ORDER TO MODIFY  
CONDITIONS OF PRETRIAL  
RELEASE**

1 IT IS HEREBY STIPULATED by the parties through their counsel that defendant  
2 VASILE MEREACRE may reside and be supervised in the Southern District of Florida  
3 in lieu of the Middle District of Florida.

4 By way of background, and in support of this stipulation, Defendant states the  
5 following:

6 1. Defendant is charged by Indictment with Conspiracy to Violate 18 U.S.C. §§  
7 1030(a)(7)(B) and (c)(3)(A) and Extortion Involving Computers in violation of 18 U.S.C.  
8 §§ 1030(a)(7)(B) and (c)(3)(A) in this District under Case No.: CR-18-00348-LHK.

9 2. On October 16, 2018, Defendant was taken into federal custody in the Southern  
10 District of Florida based on the arrest warrant in the above captioned case.

11 3. On October 22, 2018, Magistrate Judge Patrick A. White (Southern District of  
12 Florida) released Defendant on bond with the following conditions of pre-trial release  
13 pursuant to a stipulation between the United States and Defendant:

14 a. \$250,000.00 Personal Surety Bond co-signed by Defendant's parents,  
15 Nicolae and Liuba Mereacre;

16 b. \$100,000.00 Corporate Surety Bond secured by Defendant's parents  
17 property located in Palm Coast, Florida;

18 c. Defendant to reside at 109 Laguna Forest Trail, Palm Coast, Florida  
19 32164 (Middle District of Florida) during the pendency of the case;

20 d. Home Confinement monitoring;

21 e. Defendant shall post a \$25,000.00 cashier's check payable to the Clerk  
22 of U.S. District Court for the Middle District of Florida within 48 hours of his  
23 release from custody;

24 f. Report to Pre-Trial Services as directed in the Middle District of Florida  
25 with the following special conditions:

26 i. Surrender all passports and travel documents;

27 ii. No computer access except for communicating with his counsel;

g. Defendant shall appear before the Honorable Susan van Keulen, United Magistrate Judge in the Northern District of California on November 8, at 1:30 p.m. at 280 South First Street, San Jose, California 95113.

5. Defendant therefore requests this Court to modify his pre-trial release conditions as follows:

b. Impose a curfew to Defendant's home confinement between the hours of 10:00 p.m. and 6:00 a.m.

6. Undersigned counsel have conferred with AUSA Susan Knight who agrees to the requests set forth in this stipulation.

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**Stipulation and [Proposed] Order Modifying Terms of Pretrial Release**

1 SO STIPULATED:

2  
3 Dated: October 25, 2018

\_\_\_\_\_/s/\_\_\_\_\_  
Christopher G. Lyons  
Ronald Gainor  
Adam Pennella  
Counsel for Vasile Mereacre

6  
7 Dated: October 25, 2018

ALEX G. TSE  
Acting UNITED STATES ATTORNEY

8  
9  
10 \_\_\_\_\_/s/\_\_\_\_\_  
Susan Knight  
Assistant United States Attorney

11  
12  
13 SO ORDERED:

14 Dated: *October 26, 2018*

*Virginia K. DeMarchi*  
~~Honorable Nathaniel Cousins~~  
United States Magistrate Judge  
*Virginia K. DeMarchi*